

1 SEAN B. KIRBY, ESQ.
2 Nevada Bar No. 14224
3 TROUTMAN, PEPPER, HAMILTON, SANDERS, LLP
4 8985 S. Eastern Ave., Ste. 200
5 Las Vegas, NV 89123 (*Nevada Office*)
Tel: (470) 832-5586
Fax: (404) 962-6800
sean.kirby@troutman.com

6 TROUTMAN, PEPPER, HAMILTON, SANDERS, LLP
7 600 Peachtree St. NE #3000
Atlanta, GA 30308 (*Corporate Office*)

Attorney for LoanCare, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

13 | ARIC MULLINS,

14 Plaintiff,

15 ||| v.

16 EXPERIAN INFORMATION
17 SOLUTIONS, INC.; COMMUNITY
LOAN SERVICING, LLC and
LOANCARE, LLC.

18 || Defendants.

Case No. 2:24-cv-01347-JCM-NJK

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANT LOANCARE,
LLC TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT**

20 Pursuant to Local Rule IA 6-1 of the United States District Court for the District of Nevada,
21 Defendant LoanCare, LLC (“LoanCare”) by and through its counsel of record, Sean Kirby, Esq. of
22 Troutman Pepper Hamilton Sanders LLP, and Plaintiff Aric Mullins, by and through his counsel of
23 record, Gerardo Avalos, Esq., of the Freedom Law Firm, hereby stipulate to extend the time for
24 Defendant LoanCare, LLC to respond to Plaintiff Aric Mullins’s (“Plaintiff”) Complaint, as
25 follows:

26

1 1. Plaintiff's Complaint was filed on July 23, 2024.

2 2. LoanCare was served with the Complaint on July 26, 2024.

3 3. LoanCare's deadline to answer or otherwise respond to Plaintiff's Complaint is
4 August 16, 2024.

5 4. Plaintiff and Defendant LoanCare are cooperating to investigate the allegations to
6 determine whether this matter can be resolved amicably and without the expense of motion practice.

7 5. Plaintiff and LoanCare previously requested an additional sixty (60) days, up to and
8 including October 15, 2024, to formulate a response to Plaintiff's Complaint.

9 6. However, in the course of Plaintiff and LoanCare's investigation, it has recently
10 been determined that additional information is needed to allow the parties to reach a settlement or
11 for LoanCare to fully answer the Complaint.

12 7. Accordingly, Plaintiff and LoanCare now request an additional two weeks for
13 LoanCare to answer or otherwise respond to the Complaint.

14 7. This is the second request by either party seeking such an extension.

15 8. An additional thirty (14) days for LoanCare to answer or respond to Plaintiff's
16 Complaint will not prejudice any party.

17 \\\

18 \\\

19 \\\

20 \\\

21 \\\

22 \\\

23 \\\

24 \\\

25 \\\

26 \\\

27 \\\

28 \\\

1 In consideration of the foregoing, and for good cause shown, Defendant LoanCare, LLC
 2 respectfully requests that the Court extend the deadline to file an answer or otherwise respond to
 3 Plaintiff's Complaint up to and including to October 29, 2024.

4 Dated this 7th day of October, 2024.

5	6	7
	TROUTMAN PEPPER HAMILTON SANDERS LLP	FREEDOM LAW FIRM
8	<u>/s/ Sean B. Kirby</u> SEAN B. KIRBY, ESQ. Nevada Bar No. 14224 8985 S. Eastern Ave., Ste 200 Las Vegas, NV 89123 (Nevada Office) 600 Peachtree St. NE # 3000 Atlanta, GA 30308 (Corporate Office)	<u>/s/ Gerardo Avalos</u> Gerardo Avalos, Esq. Nevada Bar No. 15171 8985 S. Eastern Avenue Suite 100 Las Vegas, NV 89123 (Henderson Office)
10	<i>Attorney for Nationstar Mortgage LLC dba Mr. Cooper</i>	<i>Attorneys for Plaintiff Aric Mullins</i>
11		
12		
13	IT IS SO ORDERED:	NO FURTHER EXTENSIONS WILL BE GRANTED.
14	DATED: October 8, 2024	
15		 UNITED STATES MAGISTRATE JUDGE
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		